

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JAMES PERRY,

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Plaintiff,

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vs.

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Civil Action No.:

FLEETWOOD ENTERPRISES, INC.,
FLEETWOOD HOMES OF GEORGIA,
INC., and Fictitious
Defendants "A", "B", and "C",

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2:06-cv-00502-MEF

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Defendants.

REPORT OF PARTIES' PLANNING MEETING

Pursuant to Fed.R.Civ.P.26(f), a meeting was held on November 3, 2006 and was attended by:

Lance Gould on behalf of Plaintiff James Perry

David F. Walker on behalf of Defendants Fleetwood Enterprises, Inc. and Fleetwood Homes of Georgia, Inc.

The parties do not request a conference with the Court before entry of the scheduling order.

1. **Initial Disclosures.** The parties will exchange the information required by Rule 26(a)(1) on or before November 17, 2006.

2. **Discovery Plan.** The parties jointly propose to the Court the following discovery plan:

- a. All discovery commenced in time to be completed by June 29, 2007.
- b. Maximum of forty (40) interrogatories by each party to any other party. Responses due forty-five (45) days after service.
- c. Maximum of twenty-five (25) requests for admission by each party to any other party.

- d. Maximum of forty (40) requests for production of documents and other things by each party to any other party.
- e. Maximum of ten (10) depositions by each plaintiff to each defendant and ten (10) depositions by each defendant to each plaintiff. This number does not include depositions of medical doctors or experts. Each deposition limited to a maximum of five (5) hours for a lay witness or eight (8) hours for an expert witness unless extended by agreement of the parties.
- f. Reports from retained experts under Rule 26(a)(2) due:

From Plaintiff by July 30, 2007
From each Defendant by August 30, 2007.
Defendant shall complete its inspection of the manufactured home by July 30, 2007.
- g. Supplementation under Rule 26(e) is due reasonably upon knowledge of additional information.

3. **Other Items.**

- a. Plaintiff should be allowed until January 15, 2007 to join additional parties and to amend the pleadings, unless otherwise agreed by the parties.
- b. Defendant should be allowed until February 15, 2007 to join additional parties and to amend the pleadings, unless otherwise agreed by the parties.
- c. All potentially dispositive motions should be filed no later than August 20, 2007.
- d. Settlement cannot be realistically evaluated prior to the completion of preliminary discovery.
- e. The parties request a pretrial conference on or before October 30, 2007.
- f. Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from each party by September 30, 2007.
- g. Parties should have ten (10) days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

- h. The case should be ready for trial by November 30, 2007, and at this time trial is expected to take approximately 5-7 days.

Respectfully submitted,

/s/ C. Lance Gould
C. Lance Gould, Esq. (GOU007)
Attorney for Plaintiff

OF COUNSEL:

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/s/ David F. Walker
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CERTIFICATE OF SERVICE

I hereby certify that I have on this 6th day of November, 2006, electronically filed the foregoing instrument using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ David Walker
DAVID F. WALKER